

Exhibit A

To the Notice of Removal

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

-----X
301 DEVELOPMENT LLC,

Plaintiff,

-against-

UNITED NATIONAL SPECIALTY INSURANCE
COMPANY a/k/a UNITED NATIONAL INSURANCE
COMPANY.

Defendant.
-----X

Index No. 501863/15

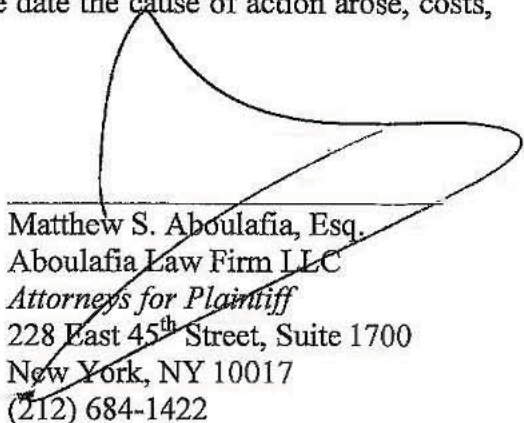
SUMMONS

Plaintiff's Address:
1458 52nd Street
Brooklyn, NY 11219

*The basis of the venue
designated is:*
Plaintiff's Address

YOU ARE HEREBY SUMMONED to answer the Complaint in this action and to serve a copy of your Answer on the Plaintiff's attorneys within twenty (20) days after the service of this summons, exclusive of the day of service or within thirty (30) days after the service is complete if this summons is not personally delivered to you within the State of New York and in case of your failure to Answer, judgment will be taken against you by default for the relief demanded in the annexed Complaint with interest from the date the cause of action arose, costs, disbursements and attorneys fees.

Dated: New York, New York
February 18, 2015



Matthew S. Aboulafia, Esq.
Aboulafia Law Firm LLC
Attorneys for Plaintiff
228 East 45th Street, Suite 1700
New York, NY 10017
(212) 684-1422

TO: United National Specialty Insurance Company
3 Bala Plaza, Suite 300E
Bala Cynwyd, PA
Service via Dept. of Financial Services

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS

-----X
301 DEVELOPMENT LLC,

Plaintiff,

-against-

UNITED NATIONAL SPECIALTY INSURANCE
COMPANY a/k/a UNITED NATIONAL INSURANCE
COMPANY.

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COMPLAINT

Plaintiff, by its attorneys, Aboulafia Law Firm LCC, as and for its Complaint, herein allege upon information and belief as follows:

FIRST: At all times hereinafter mentioned, Plaintiff 301 DEVELOPMENT LLC, is a limited liability company duly operating in the State of New York, and maintaining an ownership interest and insurance interest in the property located at 287-299 McGuinness Boulevard, Brooklyn, NY 11222 (hereinafter "subject premises").

SECOND: At all times hereinafter mentioned, Defendant UNITED NATIONAL SPECIALTY INSURANCE COMPANY a/k/a UNITED NATIONAL INSURANCE COMPANY (hereinafter "United") was and still is a corporation authorized, licensed, admitted and/or engaged in the business of providing insurance and being an insurer in the State of New York, and located at 3 Bala Plaza, Suite 300E, Bala Cynwyd, PA

THIRD: At all times hereinafter mentioned, Defendant United was and is authorized by the Department of Financial Services of the State of New York to engage in the business of insurance in the State of New York and to issue policies of insurance including the policy herein sued upon.

**AS AND FOR A FIRST CAUSE OF ACTION AGAINST
DEFENDANT UNITED**

FOURTH: On or about July 31, 2014, Defendant United made and issued to Plaintiff for good and valuable consideration a certain policy of insurance bearing policy number VB0956744 wherein and whereby Defendant did insure the subject premises.

FIFTH: That on or about November 9, 2014, while said policy was in full force and effect, Plaintiff suffered a loss by a covered peril at the subject premises insured by Defendant.

SIXTH: At all relevant times, Plaintiff had an insurable interest in the aforementioned property.

SEVENTH: As a result of the loss, Plaintiff has sustained damages in the sum of at least SEVEN HUNDRED EIGHTY-NINE THOUSAND FOUR HUNDRED FOURTEEN DOLLARS AND SIXTY-THREE CENTS (\$789,414.63).


EIGHTH: Defendant United has declined to indemnify Plaintiff for the loss sustained although claim has been duly made and all conditions of the policy have been met.

NINTH: As a result of Defendant's breach of contract, Plaintiff has been damaged in the sum of at least SEVEN HUNDRED EIGHTY-NINE THOUSAND FOUR HUNDRED FOURTEEN DOLLARS AND SIXTY-THREE CENTS (\$789,414.63).

WHEREFORE, it is respectfully requested that Plaintiff 301 DEVELOPMENT LLC have judgment against Defendant UNITED NATIONAL SPECIALTY INSURANCE COMPANY a/k/a UNITED NATIONAL INSURANCE COMPANY on the First cause of action in the sum of at least SEVEN HUNDRED EIGHTY-NINE THOUSAND FOUR HUNDRED FOURTEEN DOLLARS AND SIXTY-THREE CENTS (\$789,414.63), with interest from November 9, 2014, and for costs and disbursements of this action.

Dated: New York, New York

February 18, 2015



Matthew S. Aboulafia, Esq.
Aboulafia Law Firm LLC
Attorneys for Plaintiff
228 East 45th Street, Suite 1700
New York, NY 10017
(212) 684-1422

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF _____**

-----X

Plaintiff(s)/Petitioner(s),

Index No. _____

- against -

Defendant(s)/Respondent(s).

-----X

**NOTICE REGARDING AVAILABILITY OF ELECTRONIC FILING
SUPREME COURT CASES**

PLEASE TAKE NOTICE that plaintiff(s)/petitioner(s) [defendant(s)/respondent(s)] in the case captioned above intends that this matter proceed as an electronically-filed case in the New York State Courts Electronic Filing System ("NYSCEF") in accordance with the procedures therefor, set forth in Uniform Rule 202.5-b and described below. Under that Rule, filing and service of papers by electronic means cannot be made by a party nor can electronic service be made upon a party unless that party has consented to use of the System for the case in question. Each party served with this Notice must promptly file with the court and serve on all other parties either a consent or a declination of consent to electronic filing and service through NYSCEF for this case. (See Instruction # 2 below.)

General Information

Electronic filing offers significant benefits for attorneys and litigants, permitting documents to be filed with the County Clerk and the court and served, between or among consenting parties, by posting the documents on the NYSCEF Website, which can be done at any time of the day or night on any day of the week. There is no fee to use the NYSCEF System, whether for filing, service, or consultation of the electronic docket, nor is there a charge to print documents from the docket. Normal filing fees must be paid, but this can be done by credit or bank card on-line. For additional procedures and information, see Uniform Rule 202.5-b, any e-filing protocol that may have been promulgated by the court in question, and the NYSCEF Website at www.nycourts.gov/efile.

Instructions

1. Service of this Notice constitutes consent to e-filing and a statement of intent by the undersigned to use the NYSCEF System in this case. When an action or proceeding is being commenced through the NYSCEF System, this Notice must accompany service of the initiating papers.
2. Each party served with this Notice may consent to e-filing either: (i) by filing with the court and serving on all parties of record a consent to e-filing, or (ii) if an authorized e-filing user, by filing a consent electronically in the manner provided at the NYSCEF site. Parties who do not wish to consent must file and serve a written declination of consent. If one party or some but fewer than all parties consent, NYSCEF may be used by and between or among consenting parties.
3. Each participating attorney, unless already registered, or self-represented party must **PROMPTLY** create a NYSCEF account and obtain the confidential Filing User Identification Number and Password necessary to use the system. To create a NYSCEF account, go to www.nycourts.gov/efile, click the Create an Account link, and follow the instructions.
4. For additional information about NYSCEF, see the *User's Manual* and *Frequently Asked Questions* on the Website, or contact the court in question or the NYSCEF Resource Center (phone: 646-386-3033; e-mail: efile@nycourts.gov; mailing address: 60 Centre Street, New York, New York 10007).

Dated: _____

_____ (Signature)

_____ (Phone)

_____ (Name)

_____ (Fax)

_____ (Firm)

_____ (E-mail)

_____ (Address)

Attorney(s) for _____



NEW YORK STATE
DEPARTMENT of
FINANCIAL SERVICES

Andrew M. Cuomo
Governor

Benjamin M. Lawsby
Superintendent

STATE OF NEW YORK
Supreme Court, County of KINGS

301 Development LLC

Plaintiff(s)

501863/15

against

Defendant(s)

United National Specialty Insurance Company

RE :United National Specialty Insurance Company formerly known as Hallmark Insurance Company, Inc.
Attorney for Plaintiff(s) and Defendant(s) please take notice as follows:

Attorney for Plaintiff(s) is hereby advised of acknowledgement of service upon this Department Summons and Complaint in the above entitled action on February 23, 2015 at Albany, New York. The \$ 40.00 fee is also acknowledged.

Original to Attorney for Plaintiff(s):

Aboulafia Law Firm, LLC
Matthew S. Aboulafia, Esq.
228 East 45th Street
Suite 1700
New York, New York 10017

Persuant to the requirement of section 1212 of the Insurance Law, Defendant(s) is hereby notified of service as effected above. A copy of the paper is enclosed.

Duplicate to Defendant:

Richard S. March
United National Specialty Insurance Company
Three Bala Plaza East, Suite 300
Bala Cynwyd, Pennsylvania 19004

Jacqueline Catalfamo
Special Deputy Superintendent

Dated Albany, New York, February 25, 2015
551657